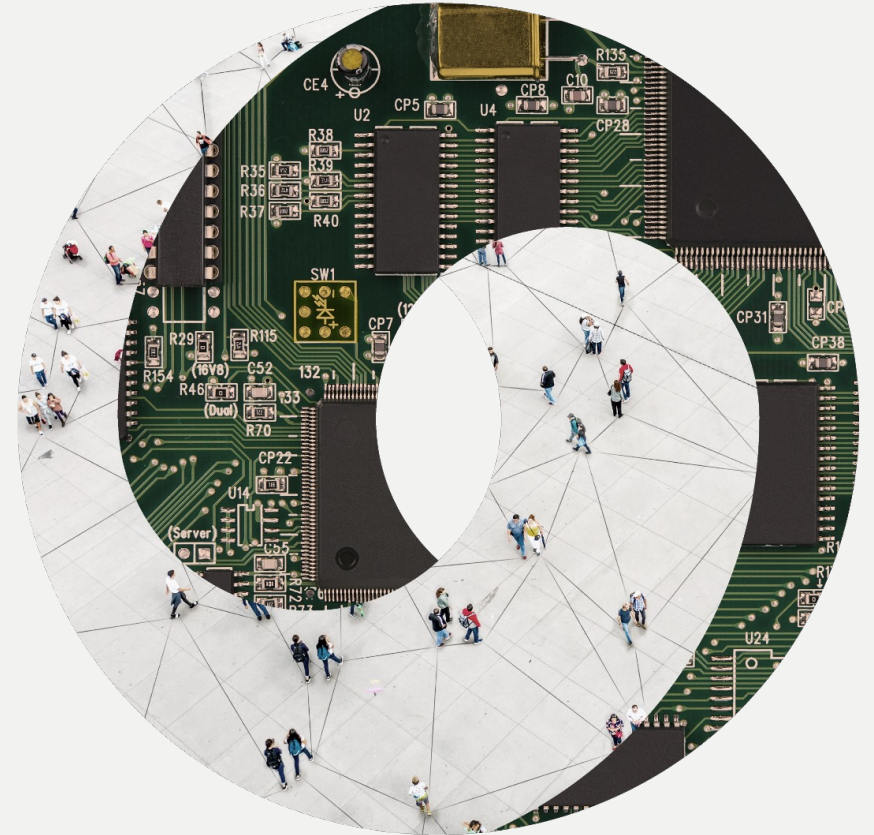


Transparency Act Account

Nagarro in Norway

June 2023



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About Nagarro and our organization

Nagarro is a leading global provider of concepts and solutions for business process digitalization. We offer a wide range of services, specializing in software development, business consulting and IT and digital product engineering. We leverage our expertise across multiple business functions to drive technology-led business breakthroughs.

Nagarro is listed on the Frankfurt Stock Exchange in Germany. Conduct AS (founded in 2001) joined the Nagarro Group on 1 February 2016 and became a Norwegian subsidiary of the group ('Nagarro in Norway').

In Norway, we are leading in identity and access management, as well as Atlassian advisory. We advise clients across sectors and industries, and support leading companies in telecommunications, automotive, public administration, banking and finance, among others. The range of our services includes consulting, system development and implementation of critical solutions in identity and access management (IAM/IRM), security (Forensics and penetration testing), Business Intelligence/Analytics and ITSM/Process Support.

We operate in 34 countries, employing over 19,000 people worldwide. Nagarro has no headquarters and operates with a virtual organizational model that is geographically unbound. We benefit from our global presence and resources by collaborating with our colleagues from other parts of the world to assist our clients. In Norway, we have offices in central Oslo, where just under 40 of our employees work in a hybrid work model.

Our guiding principles can be defined in one word – **CARING**
Client-Centric, **A**gile, **R**esponsible, **I**ntelligent, **N**on-Hierarchical, **G**lobal



The Transparency Act entered into effect on July 1, 2022. The objective of the Act is to promote and ensure that companies respect fundamental human and labor rights. The Act is also intended to ensure the public access to information about how companies manage their human rights risk.

The Transparency Act obliges Nagarro to:

- Carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises;
- Provide an account of our due diligence related to human rights and decent working conditions, and
- Respond to information requests from the general public

About this account

This account outlines our policies and procedures for managing risk related to human rights and decent working conditions, the significant risks we have identified, and the measures implemented to address our identified risk areas.

Internal Procedures and Guidelines – our Commitment to Human Rights and Decent Working Conditions

We have the following guidelines that guide our work on fundamental human rights and decent working conditions:

- Our Code of Conduct: The Nagarro Constitution
- Supplier Code of Conduct
- Internal Whistleblowing Procedure

We have a Global Code of Conduct outlining our core principles, values and our commitment to act responsibly and safeguard human rights towards our colleagues, suppliers and others involved in Nagarro.

Our 'Constitution' ([The Nagarro Constitution](#) / Code of Conduct) serves as a guideline for how we should conduct our business in a manner that respects human rights towards our own colleagues at Nagarro. It follows from our guidelines that we shall comply with all occupational health and safety laws (including laws on child labour, forced labour, working hours), as well as data protection legislation (GDPR) with protection of personal rights and privacy, not discriminate, and respect the right to freedom of expression. In addition, we have an employee handbook that applies to Nagarro in Norway that contains general information and guidelines for our own colleagues.

Our Supplier Code of Conduct describes our expectations of our suppliers to act responsibly and respect fundamental human rights. This includes requirements to comply with applicable labour rights, ensure healthy and safe working conditions, avoid discrimination, and give employees the opportunity to report any misconduct or raise concerns without retaliation. In addition, suppliers must not use child labour or forced labour, and to take appropriate care when sourcing materials from conflict-affected areas.

We are in process of developing additional guidelines and procedures as part of our annual cycle to ensure ongoing compliance with the requirements set forth in the Transparency Act. As part of these efforts, we aim to clearly define internal areas of responsibility and accountability within our organization. Further details regarding these initiatives can be found in the section titled 'Measures and Plans'.

Internal Procedures and Guidelines – how we identify and manage risk

In addition to our internal procedures and guidelines that sets direction for our efforts in promoting fundamental human rights and decent working conditions, we have in place a risk management system, whistleblowing channels, and grievance mechanisms in order to identify and address any adverse impact that may arise.

OUR RISK MANAGEMENT SYSTEM

We have a system-based risk management process that enables early identification of risk and preventive measures. The process is centrally managed and in accordance with our global organizational structure. Our approach is based on the global COSO framework and includes risk identification, assessment, communication and continuous monitoring. Our operating tool, Ginger, is our customized personal assistant and interface into Nagarro. Ginger provides automated data collection from the various operational functions globally across various risk categories, including worker discrimination and harassment, labour law infringement, immigration law infringement, workplace safety and security (incl. fires, earthquakes, floods, riots etc.)

Centralized system for local risk assessment and global management

Risk assessments are carried out by dedicated teams in all business units and operations worldwide. Managers receive requests from the system to conduct quarterly risk assessments within their areas of responsibility. This ensures that relevant areas are assessed and handled by the appropriate management functions locally. The reported data is further handled by our central 'Risk and Compliance' function which coordinates the follow-up and management of risk, including the need for risk mitigation measures, action plans and monitoring across the organization. The risks are assessed based on the likelihood of potential impact, as well as any risk-reducing circumstances and ongoing plans. In cases where significant risks are identified, further authorities are informed.

OUR WHISTLEBLOWING CHANNELS AND GRIEVANCE MECHANISMS

We have a Global whistleblowing procedure that applies to Nagarro in Norway. We have adopted a whistleblower mechanism for colleagues or other stakeholders to report concerns about unethical behavior or violations of our ethical guidelines (via HRfiles@nagarro.com or via whistleblower@nagarro.com). Colleagues are encouraged to report any misconduct and raise workplace concerns. The procedure provides guidelines for colleagues on how to report and how such reports are handled by the employer. Additionally, we have implemented an internal grievance mechanism, available to all colleagues and contracted workers in the form of an online Suggestion Box, where any misconduct or concerns can be reported. Our internal processes ensure that colleagues can report anonymously without fear of retaliation.

Our due diligence – our approach and findings

OUR APPROACH

We have in our efforts to implement the Transparency Act, conducted a high-level risk assessment to identify areas where our own operations and supply chains may have a negative impact on fundamental human rights and decent working conditions. Our approach to due diligence follows a risk-based approach, based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Model for Responsible Business Conduct. The risk assessment has enabled the identification of risk areas for our Norwegian operations, which are further prioritized based on the severity of the potential negative impact and our ability to exert influence. Our priority risk areas will guide our efforts in promoting human rights and decent working conditions, where we will adopt a preventative and risk-based approach.



THE RESULT OF THE DUE DILIGENCE ASSESSMENT

We have not identified any significant findings or actual violations of human rights and decent working conditions based on the assessments conducted thus far. The overall risk assessment has shown that we, in general, have low risk exposure. Due to the nature of our own operations and supply chains we have identified some inherent potential risks related to human rights and decent working conditions.

In accordance with the objectives of the Transparency Act, we have selected the following areas to be prioritized moving forward:

- Use of global resources in own projects
- Procurement from service industries
- Purchase of IT equipment (PC and Hardware) and promotional articles

We consider any risk of potential negative impact in our own business to be well managed through established internal routines and processes. Given the prevalence of general industry risks and risk associated with global supply chains of goods purchases, greater emphasis has been placed on measures targeting our supply chain. Further details regarding our measures implemented and plans going forward are described in more detail in the section 'Measures and Plans'.

Our due diligence – risk in our own operations

Potential risks in our own operations relate to the use of internal resources globally. In addition, our risk assessment has identified some known industry risks.

Nagarro AS mainly operates in Norway, where risk associated with fundamental human rights violations and inadequate working conditions is considered to be low, given the established legal framework and prevailing norms and labour practices in Norway. The risk is therefore considered to be well taken care of through Norwegian legislation and established practice in our own operations.

For our projects in Norway, we mainly leverage internal resources. Our resources come from countries outside of Norway as well, where labour legislation and working conditions may deviate from Norwegian standards. In addition, our colleagues work project-based which occasionally involve tight deadlines and have a flexible working arrangement in a hybrid work model. We are aware that this may potentially lead to increased workloads, work pressure, and challenges in balancing work and personal lives. However, we consider this risk to be well managed through our global systems, established internal routines and processes, and our compliance with Norwegian legislation. The use of global resources will continue to be a priority area going forward, with particular attention given to projects involving personnel from countries with lower labour standards than Norway.

Our risk assessment has identified some industry related risks that are of a general and inherent nature, rather than Nagarro-specific. The risks include the right to privacy, in addition to known industry challenges related to discrimination and harassment, which arises from structural aspects within the industry, such as the longstanding issue of gender and ethnic underrepresentation. We consider these risks to be effectively managed in Nagarro, through our established practices with robust security measures, policies and e.g. the appointment of a dedicated data protection officer (DPO) that ensure responsible handling of privacy and sensitive data. Furthermore, at Nagarro AS, we have a growing representation of women and a strong commitment to diversity, and we consider the risks to be well managed through global programs and local practices.

While the risks are considered to be well-managed, we recognize the importance of ongoing mitigating and monitoring the inherent risks in alignment with the objectives of the Transparency Act. We will therefore continue to monitor and assess the effectiveness of our internal procedures and processes for managing these risk.

Our due diligence – risk in our supply chain

The review of our supplier portfolio identified supplier segments with a higher inherent risk of human rights violations and decent working conditions.

The findings of the assessment have identified specific supplier segments that will be subject to further follow-up in our ongoing efforts:

- Use of global resources in own projects
- Procurement from service industries (cleaning, Event agency, catering/meal services, etc.)
- Purchase of IT equipment (PC and Hardware) and promotional articles

Based on our preliminary assessment, we have not made any findings suggesting the presence of actual negative impact resulting from our procurement practices that require immediate follow-up and actions.

The supply chain risk assessment identified some categories of purchases that are associated with value chains that have high to medium inherent risk related to human rights and working conditions. The risk is considered to be highest associated with the global supply chain of goods purchases, where challenges related to traceability increase the risk and limit opportunities to ensure decent working conditions throughout our supply chain. This specifically applies to purchase of goods such as PC, hardware, and purchase of promotional articles. This includes violations of labour rights, health and safety challenges. The risk is greatest associated with the production and extraction of raw materials and components used in such products.

Our largest expenditure category relate to the purchase of licenses for resale to our customers and to our internal use. The identified risk for these purchases are primarily related to general industry risk in tech license development.

In addition, we make purchases of services for internal purposes and our daily operations. This includes recruitment services, food and meal services, cleaning and events. We consider there to be medium inherent risk of indecent wages and working conditions due to known industry challenges in certain of these sectors.

Although our direct ability to influence conditions further down in the supply chain is limited, purchase of PC and hardware is one of our prioritized risk areas due to the high inherent risk and the integral role IT products play in our business operations. Furthermore, in the remaining purchasing categories where general risks have been identified in relation to procurements, we will focus our efforts on significant purchases and assess the need for further follow-up measures as deemed appropriate in line with the objectives of the act.

Moving forward, we aim to strengthen our internal procurement processes to ensure efficient identification and management of potential risks, as further detailed in the section 'Our Plans'.

Our measures – how we work to prevent and reduce the risk of negative impacts

We have implemented general measures to promote human rights and decent working conditions in its own operations and drive improvements among our suppliers and partners. The purpose of the measures is to significantly reduce the risk of negative consequences that can be associated with our business activities.

DECENT WORKING CONDITIONS IN OWN BUSINESS

- To ensure decent working conditions in our own operations, we have established **global guidelines** that ensure our colleagues, regardless of their local geographical context, adhere the same standards and are guaranteed safe and healthy working conditions.
- In addition, we employ a dedicated **Resource Management System** that keeps track of available resources and skills in our global network of colleagues. This form of resource planning to ensure optimized workload distribution in our projects and helps prevent excessive workload burdens.
- Another example is our global «**Work From Anywhere**» ('WFA') model, which offers hyper-flexibility for our colleagues and allows them to tailor their workday to their needs and chose their preferred work location. Our approach to work life flexibility fosters greater inclusion and equality in the workplace and enables our colleagues to balance personal and professional lives according to their own needs.

HUMAN RIGHTS VIOLATIONS IN OUR SUPPLY CHAIN

To reduce the risks identified in our supply chain, we have implemented general risk mitigation measures. We expect our suppliers and partners to adhere to our expectations outlines in our Supplier Code of Conduct. Going forward, we will direct our efforts on strengthening written commitments from selected suppliers and incorporate contractual requirements where applicable. Our plans and initiatives moving forward is further addressed in the next section.

Our plans – this is how we will work to prevent and reduce the risk of negative impacts moving forward

Based on our due diligence efforts thus far, we have identified targeted measures that we plan on implementing in response to our prioritized risk areas. We expect the planned measures to further reduce risk within our priority risk areas, and to increase awareness internally and among our suppliers. In our ongoing efforts, we plan to address and focus on the following areas and initiatives:

SUPPLIER FOLLOW-UP MEASURES

In order to follow up identified risks, we will strengthen our efforts to ensure the protection of human rights and decent working conditions in our procurement processes. Additionally, we will develop a more systematic approach to identifying and assessing supplier risks. We will therefore:

- Conduct a review of our own procurement practices to ensure that we have robust routines that promote responsible purchasing practices
- Continue to enhance our efforts to assess human rights risks when selecting new suppliers and making significant procurement decisions
- Ensure to facilitate effective risk management within our priority areas and supplier segments

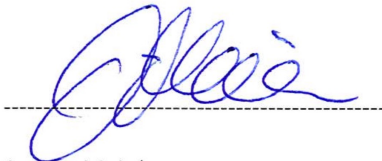
OWN OPERATIONS

Measures to address risks related to use of global resources and excessive workload; We aim to establish a more systematic approach to manage the identified risks related to the use of global resources and project-based workloads. This entails ongoing risk monitoring and ensuring continuous compliance with agreed working hours and that colleagues maintain a reasonable workload, especially when using resources located outside of Norway.

ANNUAL CYCLE

In order to ensure continuous efforts to fulfil the obligations of the Transparency Act, we are currently developing an annual cycle that outlines a set of activities aligned with the six steps of due diligence in accordance with OECD guidance. By implementing and operationalizing the annual wheel, we will ensure a systematic and continuous approach to conducting due diligence assessments and effectively managing identified risks.

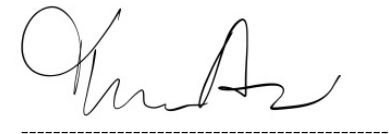
The Transparency Account has been approved by the Board of Directors of Nagarro AS on June 29th 2023.



Anette Mainka
Chairperson of the board



Jon Erik Trøften
Board member



Thomas Aardal
Board member